

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**JEREMY M. GLAPION,**

Plaintiff,

v.

**RENOVATION REFERRAL, LLC  
d/b/a SOLAR MEDIA TEAM;  
GABRIEL SOLOMON SR.**

Defendant.

Civil Case No.: 21-cv-599

**DECLARATION OF PATRICK KENNEDY**

I, Patrick Kennedy, declare as follows:

1. I am the Director of Operations at Ytel, Inc.
2. Ytel is a communications platform that provides cloud-based tools for users to call, text, and track communications with contacts.
3. As part of this offering, Ytel offers telephone numbers for lease to its users.
4. On August 20, 2021, Ytel responded to a subpoena from Jeremy Glapion as part of the case captioned above for the identity and contact information of the user of certain telephone numbers owned by Ytel.
5. A true and accurate response to this subpoena is attached to this Declaration as Exhibit A.
6. The email address associated with the account, and which is used to log

in to the account, is [gabe@solarmediateam.com](mailto:gabe@solarmediateam.com).

7. In addition, Ytel produced a csv file of outbound telephone calls made from that telephone number to telephone number 617-575-9268, which included the duration (length of the call in seconds), direction (out indicating it was an outbound call from the user), the “to” number (the number to which the call was placed), the “from” number (the number placing the call), and the timestamp (the date and time of the call).

8. Each of the numbers in the “from” field were a part of the account assigned to the entity whose information is set forth in Exhibit A.

9. This CSV file reflects 108 outbound calls.

10. This CSV file is attached to this Declaration as Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
March 3rd, 2022 (date) at 9am.

*Patrick Kennedy*

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Patrick Kennedy

# EXHIBIT A



Jeremy Glapion <jmg@glapionlaw.com>

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## Case #SUPT26918: Subpoena for customer identity

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Ytel Legal <support@ytel.com>

Fri, Aug 20, 2021 at 5:02 PM

Reply-To: Ytel Legal <cases.5129501.1668525\_3263355\_349599.afc8dff01f@5129501.email.netsuite.com>

To: jmg@glapionlaw.com

Company Info:

CompanyID - 104862

Company Name - Solar Media Team

Contact Information:

Gabe Soloman

gabe@solarmediateam.com

5615315270

Billing Address:

5379 LYONS ROAD

606

COCONUT CREEK, FL, 330732810

CDR, attached.

Ken Richard

GC/Ytel, Inc.

949-283-3017



**SUPT26918 - CompanyID 104862 - CDR.csv**

7K

# **EXHIBIT B**

service_ty	duration	direction	to	from	timestamp
call	12	out	16175759268	19412205835	2020-10-21 16:36:09.654 UTC
call	12	out	16175759268	19412205835	2020-10-20 15:30:03.609 UTC
call	12	out	16175759268	19412295901	2021-03-20 18:20:08.926 UTC
call	12	out	16175759268	19412295273	2021-06-04 17:50:48.296 UTC
call	12	out	16175759268	19412295140	2021-02-13 20:59:34.761 UTC
call	12	out	16175759268	19412295273	2021-06-02 13:07:58.317 UTC
call	12	out	16175759268	19412295140	2021-02-12 18:56:08.215 UTC
call	12	out	16175759268	17196264702	2021-06-09 21:32:51.213 UTC
call	12	out	16175759268	19412295065	2021-01-05 20:08:39.947 UTC
call	12	out	16175759268	19412205658	2021-02-18 18:49:00.625 UTC
call	12	out	16175759268	19415843763	2020-08-20 20:34:53.62 UTC
call	12	out	16175759268	19417699849	2021-03-24 14:51:19.512 UTC
call	12	out	16175759268	19417699801	2021-04-30 17:51:50.856 UTC
call	12	out	16175759268	17196264702	2021-06-07 17:54:35.078 UTC
call	12	out	16175759268	15613322717	2020-06-01 21:53:32.569 UTC
call	12	out	16175759268	17196264702	2021-06-08 17:38:16.477 UTC
call	6	out	16175759268	19412295097	2021-04-13 15:00:15.282 UTC
call	12	out	16175759268	19414992129	2020-08-28 20:54:09.917 UTC
call	12	out	16175759268	17192596508	2021-08-03 16:43:19.558 UTC
call	12	out	16175759268	19412295956	2021-03-04 17:36:50.18 UTC
call	12	out	16175759268	19414992455	2020-10-02 17:49:07.767 UTC
call	12	out	16175759268	19414992107	2020-09-15 15:27:15.095 UTC
call	12	out	16175759268	19412295956	2021-03-03 17:34:45.915 UTC
call	12	out	16175759268	19413000079	2020-11-30 17:50:26.408 UTC
call	12	out	16175759268	19412295056	2020-10-24 19:02:04.805 UTC
call	12	out	16175759268	19412295056	2020-10-24 18:47:06.824 UTC
call	12	out	16175759268	19412295936	2020-12-22 21:42:12.39 UTC
call	12	out	16175759268	19412295056	2020-10-23 20:50:07.713 UTC
call	12	out	16175759268	19412295936	2020-12-24 18:27:01.936 UTC
call	0	out	16175759268	17192596508	2021-08-19 15:44:50.585 UTC
call	12	out	16175759268	19419192276	2020-11-16 17:46:08.987 UTC
call	12	out	16175759268	19412295279	2020-09-10 17:13:02.171 UTC
call	12	out	16175759268	19412602112	2021-04-07 15:38:43.806 UTC
call	12	out	16175759268	19414992368	2020-10-07 20:46:19.655 UTC
call	12	out	16175759268	19418337236	2021-05-12 21:53:40.696 UTC
call	12	out	16175759268	19418337236	2021-05-11 21:41:26.385 UTC
call	6	out	16175759268	19412205649	2021-01-28 14:56:35.05 UTC
call	12	out	16175759268	19414992455	2020-10-03 18:00:43.306 UTC
call	12	out	16175759268	19414992702	2021-05-18 19:32:36.785 UTC
call	12	out	16175759268	17192596508	2021-06-24 21:51:13.173 UTC
call	12	out	16175759268	19418337411	2020-09-16 20:03:47.585 UTC
call	12	out	16175759268	19412295175	2020-08-06 20:58:32.771 UTC
call	12	out	16175759268	17192596508	2021-06-23 17:35:35.323 UTC
call	12	out	16175759268	17192596508	2021-07-30 17:56:03.734 UTC
call	12	out	16175759268	19412602112	2021-04-09 15:47:20.949 UTC
call	12	out	16175759268	17192596508	2021-06-25 17:05:40.78 UTC

call	12 out	16175759268	19412295105	2020-08-01 18:02:23.677 UTC
call	12 out	16175759268	19412205649	2021-01-29 15:30:52.471 UTC
call	12 out	16175759268	19419192473	2020-12-03 22:26:37.743 UTC
call	12 out	16175759268	19418337411	2020-09-17 18:38:15.573 UTC
call	12 out	16175759268	19412295103	2021-02-01 17:32:43.625 UTC
call	12 out	16175759268	17192596508	2021-07-27 21:33:17.071 UTC
call	12 out	16175759268	19419192752	2020-10-31 16:05:24.351 UTC
call	12 out	16175759268	19412205658	2021-02-26 17:58:34.357 UTC
call	12 out	16175759268	17192596508	2021-07-23 19:03:40.176 UTC
call	6 out	16175759268	19414992403	2021-01-25 15:41:57.251 UTC
call	12 out	16175759268	19418337411	2020-09-19 17:40:27.471 UTC
call	12 out	16175759268	19414990950	2021-02-03 20:31:38.975 UTC
call	12 out	16175759268	17192596508	2021-08-14 19:42:49.89 UTC
call	12 out	16175759268	19412295044	2020-07-28 13:53:33.516 UTC
call	12 out	16175759268	17192596508	2021-07-07 20:25:39.41 UTC
call	6 out	16175759268	19412295901	2021-03-16 17:04:19.992 UTC
call	12 out	16175759268	19417699526	2021-04-23 19:13:34.905 UTC
call	12 out	16175759268	19417699526	2021-04-23 20:02:40.683 UTC
call	12 out	16175759268	19414992959	2020-12-08 21:07:41.916 UTC
call	12 out	16175759268	19414992959	2020-12-08 15:00:26.062 UTC
call	12 out	16175759268	17192596508	2021-08-13 15:55:57.544 UTC
call	12 out	16175759268	19412205725	2020-07-24 14:51:43.395 UTC
call	12 out	16175759268	19414990950	2021-02-09 20:37:08.669 UTC
call	12 out	16175759268	19412295042	2020-06-16 17:25:43.928 UTC
call	12 out	16175759268	19417699526	2021-04-20 21:26:14.116 UTC
call	12 out	16175759268	19414992647	2021-04-26 15:26:33.097 UTC
call	12 out	16175759268	19412205725	2020-07-20 15:35:03.327 UTC
call	12 out	16175759268	19414992647	2021-04-27 20:12:04.091 UTC
call	12 out	16175759268	17192596508	2021-08-17 15:45:36.482 UTC
call	12 out	16175759268	19412295044	2020-07-27 13:18:48.372 UTC
call	12 out	16175759268	17192596508	2021-08-16 15:55:34.722 UTC
call	12 out	16175759268	17192596508	2021-07-08 22:16:14.813 UTC
call	12 out	16175759268	19412295576	2021-05-24 19:33:48.476 UTC
call	12 out	16175759268	19417168981	2020-10-13 13:03:24.757 UTC
call	12 out	16175759268	17192596508	2021-08-06 14:42:53.67 UTC
call	12 out	16175759268	19415843792	2021-03-08 16:32:38.743 UTC
call	12 out	16175759268	19419192545	2021-05-29 18:33:14.698 UTC
call	12 out	16175759268	19412295273	2021-05-28 19:59:42.401 UTC
call	12 out	16175759268	19412147243	2020-08-12 21:16:15.945 UTC
call	12 out	16175759268	19412295097	2021-04-19 21:09:17.198 UTC
call	12 out	16175759268	17192596508	2021-08-09 21:53:50.24 UTC
call	12 out	16175759268	19415843792	2020-12-31 16:55:46.849 UTC
call	12 out	16175759268	19417699801	2021-05-05 22:25:03.214 UTC
call	12 out	16175759268	19412132096	2020-10-19 13:30:25.807 UTC
call	12 out	16175759268	19412295273	2021-05-25 20:26:30.038 UTC
call	12 out	16175759268	19412205585	2020-12-17 21:43:15.949 UTC
call	12 out	16175759268	19412147355	2020-11-25 13:56:41.449 UTC

call	12 out	16175759268	17192596508	2021-07-22 20:55:26.904 UTC
call	12 out	16175759268	19418337411	2020-09-23 21:34:31.069 UTC
call	6 out	16175759268	19412205681	2021-03-31 16:07:09.959 UTC
call	12 out	16175759268	19412205681	2021-01-13 21:46:05.62 UTC
call	12 out	16175759268	17192596508	2021-07-21 21:36:10.649 UTC
call	12 out	16175759268	19415843836	2020-11-09 16:40:27.88 UTC
call	12 out	16175759268	19412205658	2021-02-24 21:28:32.733 UTC
call	12 out	16175759268	17192596508	2021-07-21 13:36:08.34 UTC
call	12 out	16175759268	17196264702	2021-06-12 18:31:54.658 UTC
call	12 out	16175759268	19414992513	2020-12-14 22:26:59.23 UTC
call	12 out	16175759268	19412205681	2021-01-15 16:15:28.641 UTC
call	12 out	16175759268	19412205681	2021-01-15 21:17:46.498 UTC
call	12 out	16175759268	19414992586	2020-11-05 21:02:09.192 UTC
call	12 out	16175759268	19419192744	2020-09-03 19:53:45.445 UTC
call	12 out	16175759268	19419192744	2020-09-04 21:40:43.85 UTC